

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 31, 2011

TO: Internal File *ADH*

THRU: Ingrid Campbell, Lead *IC*

FROM: Priscilla Burton, Soil Scientist *pb hm sas*

RE: Midterm Review, West Ridge Resources, Inc., West Ridge Mine, C/007/0041,
Task ID #3930

SUMMARY:

The objectives of the West Ridge mid-term review are outlined in a letter dated September 29, 2011 to Dave Shaver. Item A. refers to review of permit conditions and permittee-initiated plan changes. I have found that the Permittee has met all soil related permit conditions and commitments.

Appendix 5-15, Attachment 9 describes a commitment for soil sampling of the catchment basins upon final reclamation. The Division should add this future commitment to the annual report listing.

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

Topsoil Removal and Storage

Section 645-301-200 refers to an as-built survey of the Bear Canyon GVH topsoil stockpile (p. 2-1a). The as-built drawing is included as Attachment 11 of Appendix 5-14 (Vol. 2). The soil is stockpiled approximately six feet deep and there are 19,000 cu ft. (or 703 cu. yd.) in the stockpile.

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Appendix 5-15, Attachment 9 describes a commitment for soil sampling of the catchment basins upon final reclamation. The Division should add this future commitment to the annual report listing.

Findings:

The information provided meets the requirements of the Utah R645 Coal Rules.

EXPERIMENTAL PRACTICES MINING

Regulatory Reference: 30 CFR Sec. 785.13; R645-302-210, -302-211, -302-212, -302-213, -302-214, -302-215, -302-216, -302-217, -302-218.

Analysis:

There are two soils related permit conditions.

A commitment to quantitatively evaluate the experimental practice for five years is found in MRP, Vol. 1, Section 231.100 (p. 2-11) and in App. 2-6 (page 21). As described, this sampling will be conducted until there is a determination of reclamation success. Quantitative sampling is described as occurring 5 times over a 10 year period on Table 3-1.

The plots were reclaimed and seeded in September 2006. The 2010 sampling results were provided in the 2010 annual report and were reviewed under Task 3789. There were no significant differences in total living cover between the conventional and experimental techniques. I observed the vegetation at the site today and saw that it uniformly covers the plots. Today's photographs are in the images folder for the mine. The 2011 sampling has been conducted, but is not yet available. Based upon the successful revegetation reported in 2010, the 2011 annual report should provide the five year documentation to enable determination of revegetation success.

A second commitment to monitor the fill to protect buried topsoil is found in App. 2-8 addendum. The results of this analysis (found in the 2010 annual report), indicate that at one location, T3, the fill is accumulating salt from de-icing. This fill is protecting the topsoil below will be removed during reclamation and placed in the backfill as described in Section 231.100 (p. 2-7).

Findings:

The information provided meets the requirements of the Utah R645 Coal Rules .

RECOMMENDATIONS:

Based upon the successful revegetation reported in 2010 for the experimental practice, the 2011 annual report should provide the five year documentation to enable determination of revegetation success.

Appendix 5-15, Attachment 9 describes a commitment for soil sampling of the catchment basins upon final reclamation. The Division should add this future commitment to the annual report listing.